

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04 CR 10314 RCL
)	
(1) MANUEL E. PINALES,)	
(2) JOSE ANTONIO CRUZ,)	
a/k/a "Eduardo LNU")	
(3) LUIS R. CLAS,)	
a/k/a "Cuba")	
(4) RICHARD PENA, and)	
(5) TAJH M. WHITE)	
_____)	

GOVERNMENT'S MOTION TO EXCLUDE TIME
FROM MARCH 9, 2005 THROUGH AND INCLUDING APRIL 21, 2005

The United States, with the assent of the above-named defendants, respectfully moves to exclude, in computing the time within which the trial of this matter shall commence under 18 U.S.C. §3161(c)(1), the time period from March 9, 2005, through and including April 21, 2005, the date of the scheduled further status conference. On or about March 9, 2005, the defendants requested that the status conference scheduled for that date, March 9, 2005, be continued because defense counsel were unavailable and the defendants needed further time to review discovery and prepare their cases. The Court thus continued the status conference until April 21, 2005. Accordingly, this continuance serves the interests of justice.

For the foregoing reasons, exclusion of this time period serves the interests of justice and is appropriate under 18

U.S.C. §3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Maureen B. Hogan
Maureen B. Hogan
Assistant U.S. Attorney

Dated: April 20, 2005